

# Exhibit H

(\*11025\* or \*18253\* or \*202223\* or \*203311\* or \*203820\* or \*20473\* or \*205347\* or \*20939\* or \*23491\* or \*24544\* or \*24873\* or \*29392\* or \*77530\* or \*78030\* or \*90483\* or \*90642\* or \*90866\* or \*91235\*)

EIR or "establishment inspection report"

OAI or "official action indicated"

"voluntary action indicated"

\*diethylamine or "\*diethyl amine"

\*dimethylamine or "\*dimethyl amine"

\*dimethylformamide or DMF

\*dimethylmethanamide

\*ghost\*

\*NDEA\*

\*NDMA\*

\*nitra\*

\*nitrite\*

\*nitrosa\*

\*nitroso\*

\*NMBA\* (deferred to after JPML decision)

\*trosomine\*

(Form483) or (Form /3 483) or (483 /3 letter) or (483 /3 warn\*) or (704 pre/3 b)

C2H6N2O or "(CH3)2NN=O" or "CH32NN=O" or "(CH3)2NC(O)H" or CH32NCOH or C3H7NO or "(CH3CH2)2NH" or CH3CH22NH or C4H11N or "(CH3)2NH" or CH32NH or C2H7N or "(C2H5)2NNO" or C2H52NNO or C4H10N2O

carcin\*

deviat\* /5 cancer\* or deviat\* /5 toxic or or deviat\* /5 hazard\* or deviat\* /5 fatal

FDA /10 warning

gene\* /3 mutat\*

genotoxic\*

solvent /5 cancer\* or solvent /5 toxic or or solvent /5 hazard\* or solvent /5 fatal

solvent\* /5 contamin\*

(test\* /5 canc\*) AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))

tetrazol\*

Valisure\*

**<term> (no modifiers)^**

^Except if run against custodians in management over more than one facility, in which case to be run as indicated in agreed to procedure.

| Last Name   | First Name |
|-------------|------------|
| Agrawal     | Atul       |
| Akhtar      | Saleem     |
|             |            |
| Amin        | Pankaj     |
| Arasu       |            |
| Arista      |            |
| Arroyo      |            |
| Baker       | Peter      |
| Barreto     |            |
| Barrowcliff |            |
| Bellamy     |            |
| Bernard     | Tonia      |
| Bizjak      |            |
| Boyd        | Justin     |
| Bretz       | Paula      |
| Brown       | Darren     |
| Cartwright  |            |
| Casale      |            |
| Chapman     | Johnathan  |
| Charity     | Antony     |
| Chester     | Bonita     |
| Clausen     |            |
| Cosgrove    |            |
| Cruz        |            |
| Dezan       |            |
| Dickinson   | Gwyn       |
| Dobbin      |            |
| Dombrowski  |            |
| Donald      | Steven     |
| Dong        | Eric       |
| Eban        |            |
| Ernst       |            |
| Estrella    | Maria      |
| Etminan     |            |
| Ford        | Susanna    |
| Frazier     | Laurie     |
| Gavini      |            |
| George      | Jogy       |

**Last Name Standalone  
UNLESS IF First Name  
Exists, THEN (Last Name  
/3 First Name) OR (Last  
Name AND <Regulatory  
Modifiers>)**

|                                  |          |
|----------------------------------|----------|
| Ghoshal                          | Rabin    |
| Gidado                           |          |
| Goga                             |          |
| Goga                             | Michael  |
| Hall                             | Patrice  |
| Hallas                           |          |
| Harouaka                         |          |
| Hebert or Della or<br>Dellareese |          |
| Hicks                            | Kellia   |
| Higgins                          | Brooke   |
| Huaren                           |          |
| Hustedt                          |          |
| Johansen                         |          |
| Jones                            | Latoria  |
| Karapetyan*                      |          |
| Khan                             | Farhana  |
| Khurana                          | Sangeeta |
| Kristensen                       |          |
| Lopez Rubet                      |          |
| Maldonado                        |          |
| Mankind                          |          |
| Mansournia                       |          |
| Marcisin                         |          |
| Martinez                         | Miguel   |
| Mason                            | James    |
| Mathew or Mathews                | Lata     |
| Mayasandra                       | Pal      |
| Melende                          |          |
| Min                              | Ko       |
| Mistler                          |          |
| Motamed                          |          |
| Motta                            |          |
| Mueller                          |          |
| Narula                           |          |
| Navas                            |          |
| Nguyen                           | Truong   |
| Oladimeji                        |          |
| Panicker                         |          |
| Patel                            | Nayan    |
| Philopoulos                      |          |
| Pitts                            | Simone   |
| Podaralla                        | Satheesk |
| Pottegard                        |          |
| Priester                         |          |
| Pyramides                        |          |
| Quartarolo                       |          |

|             |           |
|-------------|-----------|
| Ray         | Marcus    |
| Razzaghi    | Frederick |
| Roberts     | Daniel    |
| Roy         | Melissa   |
| Schwartz    | Paul      |
| Shah        | Dipesh    |
| Skanchy     |           |
| Srivasta    |           |
| Srivastava  | Rajiv     |
| Stieg       |           |
| Sweeney     |           |
| Szestypalow |           |
| Tomasso     |           |
| Ulysse      |           |
| Upadhyay    | Pratik    |
| Verdel      |           |
| Wakijira    | Chaltu    |
| Wang        | Zhao      |
| Warnick     |           |
| Xu          | Atul      |
| Young       | Rochelle  |
| Yuscus      |           |
| Zaklady     |           |
| Zamil       |           |
| Zamperini   |           |
| Zhen Zhou   |           |

|   |
|---|
| ("adverse event*" or AER) and (<drug name> or <solvents> or <facility names>)             |
| "changes being effected"  |
| "prior approval supplement"   |
| adulterat*  |
| alert*  |
| CAPA or corrective pre/3 "preventive action"  |
| CFR or eCFR or "code of federal regulations" or USC or "United States Code" or "Title 21" |
| Citizen* pre/3 Petition   |
| (Establishment pre/3 Inspection)  |
| import* /3 (ban or alert or restrict*)  |
| inadequat*  |
| inspect*  |
| investigat*   |
| major /3 change   |
| (master /3 file) and (<drug name> or <solvents>)  |
| minor /3 change   |
| moderate /3 change  |
| Monthly /3 update   |
| (official pre/3 action* /4 indicat* )   |
| observation*  |
| OOS or "out of spec*" or "out-of-spec*"   |
| OOT or "out-of-trend" or "out of trend"   |
| PADER* and (<drug name> or <solvents> or <facility names>)                                |
| VAI or (voluntary pre/3 action* /4 indicat*)  |
| violat*   |
| warn*   |

**<Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>) OR <regulatory modifiers> OR <facility names>)**

|  |
|--|
| (bottle pre/2 lies) or Eban                      |
| bury or burie* or conceal*                       |
| cGMP* or (current pre/5 manufacturing) or GMP*   |
|  |
| "cover up*" or coverup* or "cover-up"            |
| crash* or disaster*                              |
| data /4 integrity or data /4 reliabl*            |
| delet* or destroy* or remov* or trash* or shred* |
| hide* or suppress*                               |
| whistleblow*                                     |

**<Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>) OR <regulatory modifiers> OR <inspect> OR <manufacturing modifiers> OR <medical modifiers> OR <facility names>)**

|   |
|---|
| "anion-exchange" or anionexchange or "anion exchange" |
| "ion-exchange" or ionexchange or "ion exchange"       |
| *PCRC*  |
| aberran*  |
| abnorm*   |
| ALS   |
| bioequiv*   |
| CAPA or corrective pre/5 action                       |
| Chromato*   |
| complain*   |
| contami*  |
| degradant* or impurit*                                |
| detect*   |
| El-MS or EL-MS or "electron ionization"               |
| elude*  |
| fail*   |
| fatal*  |
| GC or "GC-FID" or GCMS or "GC-MS"                     |
| hazard*   |
| headspace   |
| heat  |
| HPLC-UV   |
| HS  |
| incomplet* /5 data*                                   |
| LCMS  |
| mass spectro*   |
| method /5 qualification                               |
| noise*  |
| noti* w/5 pharm*                                      |
| obscure*  |
| observation*  |
| peak*   |
| press /4 release                                      |
| preventative /5 action                                |
| problem*  |
| puri*   |
| quality   |

**<Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>) OR <manufacturing modifiers>)**



|                         |
|-------------------------|
| recall*                 |
| repe* /4 error*         |
| residu*                 |
| retrospec*              |
| risk*                   |
| signal*                 |
| spectro*                |
| spike*                  |
| suitab*                 |
| toxic*                  |
| unknown* or unk or unks |
| validat*                |

|  |
|--|
| "PROCESS I" or "PROCESS II"                  |
| assay*                                       |
| assessment*                                  |
| batch /5 records                             |
| biocompat*                                   |
| byproduct*                                   |
| CAPA or corrective pre/3 "preventive action" |
| certificat*                                  |
| change* /3 control*                          |
| change* /5 process*                          |
| COA or certificat* pre/3 analys*             |
| concentra*                                   |
| condensa*                                    |
| conversion*                                  |
| critical /4 change                           |
| crude*                                       |
| deviat*                                      |
| diastereo*                                   |
| discrepanc*                                  |
| error*                                       |
| esterficat*                                  |
| expir*                                       |
| *formaldehyde*                               |
| malfunct*                                    |
| material* /3 loss*                           |
| moiety or moieties                           |
| process /5 change                            |
| quench*                                      |
| reagent*                                     |
| reclaim*                                     |
| recover*                                     |
| recycl*                                      |
| repack* or "re-pack*"                        |
| resal*                                       |
| resell*                                      |
| reuse*                                       |
| ring*  |
| solvent*                                     |
| suppress*                                    |
| TEA or Triethyl*                             |
| temperature                                  |

**<Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))**

|                  |
|------------------|
| TIN or Tributyl* |
| yield*           |

|                                      |
|--------------------------------------|
| bladder*                             |
| blood*                               |
| cancer* or precancer* or pre-cancer* |
| colon*                               |
| death* or dead or fatal              |
| esophag*                             |
| gastro*                              |
| intestin*                            |
| kidn* or renal*                      |
| laten*                               |
| leukemia*                            |
| liver*                               |
| lymphoma*                            |
| muta*                                |
| myeloma*                             |
| NHL or non-hodgkin*                  |
| toxicolog*                           |
| onset*                               |
| oncolog*                             |
| ovar*                                |
| pancrea*                             |
| prostate*                            |
| stomach*                             |

**<Term> AND (<Drug  
Name> OR (<Solvents>  
AND NOT <other drug  
names>))**

|  |
|--|
| AWP or "average wholesale price" or WAC or "wholesale acquisition cost"  |
| best /3 pric*  |
| bulk /3 suppl*   |
| impairment   |
| IRR  |
| manufactur* /3 cost*   |
| marginal /5 cost*  |
| market* /5 share*  |
| net /5 profit*   |
| net /5 valu*   |
| NPA  |
| NPV  |
| rate /10 return  |
| rebate*  |
| sourc* w/5 agree* or sourc* w/5 anal* or sourc* w/5 contract* or sourc* w/5 forecast* or sourc* w/5 plan* or sourc* w/5 strat*   |
| suppl* w/5 agree* or suppl* w/5 anal* or suppl* w/5 contract* or suppl* w/5 forecast* or suppl* w/5 plan* or suppl* w/5 strat*   |
| SWOT or (strength pre/7 threat*)   |
| writ* pre/5 off  |
| (ABDC or Amerisource* or "American Health Packaging" or AHP) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss) |
| (AG) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or gross or gross or loss)   |
| (amerisource* ) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)  |
| (ANDA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)   |
| (ASB) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)  |

**<Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))**

|  |
|--|
| (Authorized /4 generic) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share)                              |
| (average or avg) AND (pric* or cost* or margin* or profit* or revenue*)  |
| (avg ) AND (pric* or cost* or margin* or profit* or revenue*)  |
| (boehringer ingelheim) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss) |
| (cardinal) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)             |
| (contract ) AND (distrib* or PBM)  |
| (cost* ) AND (analy* or forecast* or plan* or strat*)  |
| (CVS*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)                 |
| (Epic) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)                 |
| (ESI) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)                  |
| (Express*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss)             |
| (IMS) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or  |
| (IQVIA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or  |
| (Kroger) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)                          |
| (mckesson) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)                        |
| (operat* w/5 margin*) AND (margin* or profit*)   |
| (Optum*) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss)                          |
| (pric*) AND (decreas* or increas* or list* or strat* or expect* or project*)   |
| (recall) AND (loss or impairm* or write* or reimburs* or indemn* or charg* or replace*)  |

|   |
|---|
| (Redoak) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or loss) |
|---|

|  |
|--|
| (retail) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or |
|--|

|                     |
|---------------------|
| (Rite*) AND (pric*) |
|---------------------|

|                                   |
|-----------------------------------|
| (sales ) /5 (expect* or project*) |
|-----------------------------------|

|                    |
|--------------------|
| (var* ) /5 (cost*) |
|--------------------|

|                        |
|------------------------|
| (variable ) /5 (cost*) |
|------------------------|

|   |
|---|
| (Walgreen* or WBDA) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss) |
|---|

|   |
|---|
| (Walmart) AND (pric* or cost or market* or AWP or WAC or profit or margin* or stock or share or indemn* or indemn* or loss) |
|---|

|  |
|--|
| Alembic  |
| ABDC or Amerisource* or "American Health Packaging" or AHP |
| Amerigen   |
| ANDA   |
| Auro* or APL or APUSA                                      |
| boehringer ingelheim                                       |
| Bristol  |
| Camber   |
| Cobalt   |
| distribut*   |
| Forest   |
| Hetero   |
| Huahai   |
| Indoco   |
| Ivax   |
| Jubilant   |
| Lantech*   |
| Macleod*   |
| Matrix   |
| Mylan  |
| Novartis   |
| Par  |
| Prinston   |
| Qualanex   |
| Ranbaxy  |
| Sandoz   |
| Syncore  |
| Synthon  |
| Teva   |
| Torrent  |
| Unichem  |
| Watson   |
| Zhejiang*  |
| ZHP  |

**<Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>))**



|                   |
|-------------------|
| *Valsartan*       |
| amlodipine*       |
| Diovan*           |
| Exforg*           |
| HCT or HCTZ       |
| sartan or sartans |

**<drug names modifiers>**

|                  |
|------------------|
| *azide*          |
| *formaldehyde*   |
| *-N3*            |
| *xylene*         |
| acid*            |
| aqueous*         |
| chloramin*       |
| HNO2             |
| hydrochlor*      |
| N-3*             |
| NaNO*            |
| tolue*           |
| Tributyl* or TIN |
| Triethyl* or TEA |
| zinc /3 chloride |
| ZnCl*            |

**<solvents modifiers>**

|   |
|---|
| "Abbreviated New Drug Application" or ANDA  |
| CDC or "Centers for Disease Control"  |
| CDER or "Center for Drug Evaluation and Research"   |
| DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency"                       |
| "Environmental Protection Agency" or EPA or USEPA or "US-EPA" or "1200 Pennsylvania Avenue" |
| "Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park"                |
| NIH or "National Institutes of Health"  |
|   |

**<regulatory modifiers>**

|          |
|----------|
| Agency   |
| inspect* |
| regulat* |

**<inspect modifiers>**

|   |
|---|
| backup /3 data  |
| impurit* and degradant*   |
| recall*   |
| residu*   |
| solvent*  |
| spike*  |
| test*   |
| unknown /3 peak or unknown /3 spike or unknown /3<br>impurit* or unknown /3 contamin* |

**<manufacturing modifiers>**

|   |
|---|
| "adverse event*" or AER*                                      |
| bladder*  |
| blood*  |
| cancer* or precancer* or pre-cancer*                          |
| colon*  |
| death* or dead or fatal                                       |
| esophag*  |
| gastro*   |
| intestin*   |
| kidn* or renal*   |
| laten*  |
| leukemia*   |
| liver*  |
| lymphoma*   |
| MedWatch* or "Safety Information and Adverse Event Reporting" |
| muta*   |
| myeloma*  |
| NHL or non-hodgkin*   |
| toxicolog*  |
| onset*  |
| oncolog*  |
| ovar*   |
| PADER*  |
| pancrea*  |
| prostate*   |
| stomach*  |

**<medical conditions  
modifiers>**

|          |
|----------|
| analys*  |
| AWP      |
| cost*    |
| decreas* |
| distrib* |
| expect*  |
| gross    |
| impairm* |
| increas* |
| indem*   |
| list*    |
| loss*    |
| margin*  |
| market*  |
| net      |
| PBM      |
| plan     |
| pric*    |
| profit*  |
| project* |
| recall*  |
| revenue* |
| share*   |
| stock*   |
| strat*   |
| WAC      |
| write*   |

**<economic modifiers>**

**TO BE DETERMINED**

Plaintiffs have just received the lists provided by Defendants and are still determining how to best search for facility names, as many facilities appear to be just referred to by the city name.

**<facility names modifiers>**



|                                   |
|-----------------------------------|
| ABPI                              |
| AEMPS                             |
| Agency /3 Therapeutic             |
| AIFA                              |
| ALIMS                             |
| ANMAT                             |
| BDA                               |
| BfArM                             |
| "British Pharmaceutical Industry" |
| "Bulgarian Drug Agency"           |
| Canad* /3 Health                  |
| "Central drugs standard control"  |
| CEP                               |
| DKMA                              |
| EMA                               |
| European /3 medic*                |
| "European Medical"                |
| Fimea                             |
| "Health Canada"                   |
| Health* /5 Agency                 |
| Hong Kong /7 "Drug Office"        |
| HPRA                              |
| IMA                               |
| MEB                               |
| Medical /4 agency                 |
| "Medical Products Agency"         |
| MFDS                              |
| MHRA                              |
| Ministry /3 Health                |
| Ministry /5 drug                  |
| MPA                               |
| NAMMD                             |
| NHS                               |
| NIHS                              |
| NoMA                              |
| NPRA                              |
| OGYEI                             |
| PHARMAC                           |
| SAMLV                             |
| SAMR                              |
| SCMA                              |
| SIDC                              |
| "State Administration for Market" |
| SUKL                              |
| Swissmedic                        |

**<foreign regulatory agency  
modifiers>**

|                                    |
|------------------------------------|
| TGA                                |
| "Therapeutic Goods Administration" |

## SEARCH TERMS PROCEDURE

### 1. Search Terms

The Primary Search Terms and Modifiers lists attached hereto as Exhibits A and B shall be used for searching of custodial records subject to the procedure set forth herein.

### 2. Standalone Terms

a) The following terms shall remain on the standalone terms list but can be tested and refined further if a need is shown after documents are collected and preliminarily reviewed:

- i. \*diethylamine or "\*diethyl amine"
- ii. \*dimethylamine or "\*dimethyl amine"
- iii. \*dimethylformamide or DMF
- iv. \*dimethylmethanamide
- v. \*ghost\*
- vi. \*NDEA\*
- vii. \*NDMA\*
- viii. \*nitra\*
- ix. \*nitrite\*
- x. \*nitrosa\*
- xi. \*nitroso\*
- xii. \*trosomine\*
- xiii. C<sub>2</sub>H<sub>6</sub>N<sub>2</sub>O or "(CH<sub>3</sub>)<sub>2</sub>NN=O" or "CH<sub>3</sub>2NN=O" or "(CH<sub>3</sub>)<sub>2</sub>NC(O)H" or CH<sub>3</sub>2NCOH or C<sub>3</sub>H<sub>7</sub>NO or "(CH<sub>3</sub>CH<sub>2</sub>)<sub>2</sub>NH" or CH<sub>3</sub>CH<sub>2</sub>2NH or C<sub>4</sub>H<sub>11</sub>N or "(CH<sub>3</sub>)<sub>2</sub>NH" or CH<sub>3</sub>2NH or C<sub>2</sub>H<sub>7</sub>N or "(C<sub>2</sub>H<sub>5</sub>)<sub>2</sub>NNO" or C<sub>2</sub>H<sub>5</sub>2NNO or C<sub>4</sub>H<sub>10</sub>N<sub>2</sub>O
- xiv. tetrazol\*
- xv. gene\* /3 mutat\*
- xvi. genotoxic\*
- xvii. carcin\* (but may modify if needed)
- xviii. deviat\* /5 cancer\* or deviat\* /5 toxic or deviat\* /5 hazard\* or deviat\* /5 fatal (but may modify if needed)
- xix. FDA /10 warning (but may modify if needed)
- xx. solvent /5 cancer\* or solvent /5 toxic or solvent /5 hazard\* or solvent /5 fatal (but may modify if needed)
- xxi. solvent\* /5 contamin\* (but may modify if needed)
- xxii. Valisure\* (but may modify if Valisure comes up for a reason other than its role in relation to detecting nitrosamines).

b) The following terms (1) when used against data of custodians working only at a particular facility would be run as standalone terms; and (2) when used against data of custodians in management over more than one facility would be run with <term> AND (<Drug Name> OR <Solvents> OR <Facility Name>), but can be tested and refined further to be <term> AND <facility name> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>)) if needed:

- i. EIR or “establishment inspection report”
- ii. OAI or “official action indicated”
- iii. “voluntary action indicated”
- iv. (Form483) or (Form /3 483) or (483 /3 letter) or (483 /3 warn\*) or (704 pre/3 b)

**3. Manufacturing, Medical Conditions, Economic Terms, Entities**

- a) The search string for these primary terms categories shall be: <Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>)) where <other drug names> will be an agreed to list of the names of each other non-valsartan (or other sartan depending on the JPML’s ruling) drug manufactured by the defendant running the modifiers;
- b) Plaintiffs will identify a subset of these terms that they believe need to be run with <Term> AND (<Drug Name> OR <Solvents>) instead (i.e. without excluding other drug names), which will be subject to testing and sampling as to the differential results;
- c) Any terms still in dispute after such testing, sampling, and meet and confers will be promptly brought to the Court for resolution.

**4. QA-Testing, cGMP, and Regulatory**

- a) The search string for these shall be: <Term> AND (<Drug Name> OR (<Solvents> AND NOT <other drug names>) OR [other categories of modifiers]);
- b) The Parties will negotiate any further modifications in either direction (e.g. narrowing or broadening), if needed, once documents have been collected and initially reviewed.
- c) Any terms still in dispute after such testing, sampling, and meet and confers will be promptly brought to the Court for resolution.

**5. 31 Terms Completely Objected to by Defendants**

- a) Defendants will run hit counts using the search string agreed upon for each particular term for those terms Defendants objected to (highlighted in yellow on search terms lists);
- b) The hit counts will be reviewed, documents sampled if necessary, and the Parties will meet and confer on how to narrow the terms if needed;
- c) If the Parties cannot agree, they will promptly bring the issue to the Court for resolution.